

The Honorable Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

SEA GREEN PARTNERS, LLC, a Washington limited liability company dba SEA MARINE, LLC

## AT LAW AND IN ADMIRALTY

11

**Plaintiff,**

No. 3:20-cv-05142-BHS

**STIPULATED MOTION  
and ORDER  
FOR REMOVAL OF ONLINE REVIEWS**

BARBARA GAIL, Official Number 670676, her engines, machinery, tackle, apparel, furniture, equipment, cargo, and appurtenances, and *In Rem*, RICHARD PACK and BARBARA ZIMONJA, his wife, and their marital community, MARGENE MARINE LLC, a Wyoming limited liability company, WESTERN WATERS LLC, a Colorado limited liability company, *In Personam*,

### Defendants.

## **STIPULATION**

COME NOW the parties, by and through their respective counsel, and hereby enter this stipulation for an order for the removal/deletion of online reviews and/or complaints, however characterized, Defendants posted or caused to be posted about Plaintiff. Defendants seek to comply with the parties' settlement agreement, which requires, in relevant part, that Defendants remove/delete the subject online reviews and/or complaints. One website, www.complaintsboard.com, hosting some of the subject reviews and/or complaints, requires a

1 signed court order in order to remove/delete the subject reviews and/or complaints. In light of  
2 these facts, the parties respectfully request the Court sign an Order authorizing Defendant  
3 Richard Pack to permanently remove/delete from www.complaintsboard.com the subject reviews  
4 and/or complaints from www.complaintsboard.com, in addition to any comments thereto, and  
5 requiring Defendant Richard Pack to request removal/deletion of the subject reviews and/or  
6 complaints within one week of this Order's entry.  
7

8 The subject reviews to be removed/deleted are as follows:  
9

“xxxxxxxxxxxxxxxxxxxxzzzzzzz of US  
10 Dec 08, 2021 3:35 pm EST  
Verified customer

11 **Electrical Fire**  
12

13 FIRE—Went to Sea Marine, and on our work order, we had no request  
from us for electrical work. Our boat had no previous electrical issues  
14 before arriving at Sea Marine, but Sea Marine decided we needed  
electrical wiring replacement. Sea Marine hired a subcontractor to go  
15 through the wiring whose background was installing car stereos? FIRE,  
lots of Smoke.

16 **Desired outcome:** Help”  
17

“Update by xxxxxxxxxxxxxxxxxxxxxxxzzzzzzz  
18 Dec 08, 2021 3:36 pm EST

19 Sea Marine  
20

419 Jackson St B, Port Townsend, WA 98368”  
21

“Unhappy for sure of Salt Lake City, US  
22 Dec 09, 2021 7:12 pm EST  
Verified customer

23 Chris Bakken, Sea Marine General Manager, always has a story to tell that  
he hopes will cover any responsibility for workmanship done by Sea  
24 Marine.  
25

The truth is that the switch had been tested before taking the boat to Sea  
26 Marine by a licensed surveyor as well as others and no problems. The

1 switch failed because someone ran a hot lead back to the switch from the  
2 termination point.  
3 I am looking forward to Chris Bakken's story because he always has one  
to cover himself."

4 "xxxxxxxxxxxxxxxxxxxxzzzzz of US  
5 Mar 08, 2022 1:15 am EST  
6 Verified customer

7 **Installation of Stern thruster.**

8 Went to Sea Marine to have stern thruster installed. Sea Marine installed  
9 upside down and this is the way they delivered the boat back to us. Cannot  
access inspection plate or work on it. Will need to have someone reinstall  
correctly.

10 Read full review of Sea Marine"

11 "xxxxxxxxxxxxxxxxxxxxzzzzz of US  
12 Nov 01, 2019 1:09 am EDT  
13 Verified customer

14 **workmanship**

15 In my opinion, the canvas work done by Sea Marine is very mediocre.  
16 Here is the way Sea Marine charges. They give you a price. If job goes  
over they will charge you more. If the job is under they will charge you  
the price they first gave you. It's all about Sea Marine.  
17 They had to redo the canvas 3 times on my job. So they were very  
comfortable in charging me for all 3 redos even though it was Sea Marine  
mistake. When I caught the bogus charge and complained to Chris Bakken  
he was very reluctant to take it off. Said he was a time and material  
operation. In my opinion he hopes the customers are stupid.

18 Read full review of Sea Marine and 1 comment"

19 "R-english of US  
20 Oct 16, 2019 10:40 pm EDT

21 **Not worth going to sea marine**

22 Bad experience. Before I showed for my scheduled work to start on may  
1, I tried to get details about where to tie up and where we were hauling  
out and never got a response the week before I showed up. I then called  
again, on my way down to deliver the boat, with no response from chris  
bakken. They did not start work for over a week. Then honestly,

1 everything they did was mediocre and unacceptable – no trained  
2 employees at sea marine. Subcontractors did most of the work and were  
not certified.

3 Read full review of Sea Marine and 4 comments”

4 “Joe Joe Manning of HK  
5 Oct 16, 2019 5:42 pm EDT  
6 Verified customer

7 Beware. Sea marine web page says they are experts. Lies, lies... All the  
8 info on their web page is old. They no longer have trained employees.  
9 They shorted out my electrical system, and I am still trying to get my boat  
back working like it did before I took it to chris bakken at sea marine.  
Dishonest operation. Chris bakken pads his invoices so look for it. My  
advice is to go anywhere else.”

10 “DickZ of US  
11 Oct 16, 2019 6:04 pm EDT  
12 Verified customer

13 See Marine replaced my site gauge on my water tank. Sea Marine  
14 employee cracked the glass during installation. Found the problem the day  
15 after I left. Chris Bakken said it was my problem. I will never go near Sea  
16 Marine again. They are very dishonest — awful work done at Sea Marine.  
I heard they were going into a lawsuit because of their dealings with their  
customers.”

17 STIPULATED TO this 6<sup>th</sup> day of April, 2023.

18 MULLAVEY, PROUT, GRENLLEY & FOE, LLP HOLMES WEDDLE & BARCOTT PC

20 *s/Daniel A. S. Foe*

21 Daniel A. S. Foe, WSBA No. 42876  
22 Aaron J. Naff, WSBA No. 51200  
23 Attorneys for Plaintiff  
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20 *s/Lafcadio Darling*

21 Lafcadio Darling, WSBA No. 29963  
22 Attorneys for Defendant/Counterclaim  
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Email: klavoie@hwb-law.com

1 DAVIS ROTHWELL EARLE & XÓCHIHUA  
2  
3

s/ *John E. Moore*

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4 John E. Moore, WSBA No. 45888  
5 Attorneys for Counterclaim Defendant  
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Email: jmoore@davisrothwell.com

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STIPULATED MOTION and ORDER FOR REMOVAL  
OF ONLINE REVIEWS – Page 5 (3:20-cv-05142-BHS)

**MULLAVEY, PROUT, GRENLEY & FOE, LLP**  
2401 NW 65<sup>TH</sup>  
P.O. BOX 70567  
SEATTLE, WA 98127-0567  
(206) 789-2511  
FAX: (206) 789-4484

## ORDER

BASED on the foregoing Stipulation, it is hereby

ORDERED that the following reviews shall be permanently removed/deleted from www.complaintsboard.com:

“XXXXXXXXXXXXXXXXXXXXZZZZZ of US

Dec 08, 2021 3:35 pm EST

## Verified customer

## **Electrical Fire**

FIRE—Went to Sea Marine, and on our work order, we had no request from us for electrical work. Our boat had no previous electrical issues before arriving at Sea Marine, but Sea Marine decided we needed electrical wiring replacement. Sea Marine hired a subcontractor to go through the wiring whose background was installing car stereos? FIRE, lots of Smoke.

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Sea Marine

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The truth is that the switch had been tested before taking the boat to Sea Marine by a licensed surveyor as well as others and no problems. The switch failed because someone ran a hot lead back to the switch from the termination point.

I am looking forward to Chris Bakken's story because he always has one to cover himself."

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19 mistake. When I caught the bogus charge and complained to Chris Bakken  
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14 after I left. Chris Bakken said it was my problem. I will never go near Sea  
15 Marine again. They are very dishonest — awful work done at Sea Marine.  
16 I heard they were going into a lawsuit because of their dealings with their  
17 customers.”

18  
19 Defendant Richard Pack, in conformance with the parties' settlement agreement, shall  
20 convey this Order to [www.complaintsboard.com](http://www.complaintsboard.com) and request the permanent removal/deletion of  
21 the aforementioned reviews and/or complaints, in addition to any comments thereto, from  
22 [www.complaintsboard.com](http://www.complaintsboard.com) within one week of this Order's entry.

23 IT IS SO ORDERED this 7th day of April, 2023.

24  
25  
26 

27 HONORABLE BENJAMIN H. SETTLE  
28 UNITED STATES DISTRICT JUDGE

1      *Prepared by:*  
2      MULLAVEY, PROUT, GRENLEY & FOE, LLP

3      *s/Daniel A. S. Foe*

4      \_\_\_\_\_  
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